

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

**UNITED STATES OF AMERICA**

**v.**

**Case No.: 2:23-CR-00111**

**SEAN CHRISTOPHER WILLIAMS**

**Motion to Request New Counsel**

I am requesting counsel from outside of the Tri-Cities and surrounding area be appointed to ensure counsel is unbiased and minimize the possibility that counsel can be influenced by the following circumstances. As well as prevent prejudice that may stem from local attorneys' possible previous relationships with any of the 25 police officers listed as defendants in any of the 3 civil cases they are involved in.

1) A civil suit filed by Kat Dahl the former SAUSA in the Eastern District of Greeneville Tennessee which is centered around Sean Williams and names the police chief, police captain, two detectives and 6-12 officers as defendants in the case. The suit also alleges police corruption and hundreds of thousands of dollars being extorted from Sean Williams. The former SAUSA named as a plaintiff in the suit alleges that she was fired in retaliation for blowing the whistle on an alleged adult sex trafficking scheme. The suit is pending trial within months or weeks of case cr-111.

2) Two more separate civil suits against the city of Johnson City as well as Washington County police department employees that are listed above as defendants, one of which is also pending trial within months of case cr-111. Both of these suits make the same claims of police corruption and extortion. One of the cases alleges police retaliation on one of the plaintiffs named in the case.

3) All three of these suits have been filed in the same district as case cr-111. Sean Williams is named over 400 times in the above pending suits.

4) Active local and federal investigations are still open involving the potential extortion sex trafficking schemes alleged in all 3 civil suits.

5) The civil suits mentioned above are Case 2:23-cv-00071 and 2:2022cv00072 and 2:2024cv00106.

6) Additionally, Mike Little from the Tennessee Bureau of Investigation wrote in a July 16 affidavit, "I have discovered a total of approximately 67 individuals who have either been confirmed as being or were likely to have been victims of sexual assaults by Sean Williams."

The substantial number of "victims" alleged in this statement further increases the possibility that counsel appointed from anywhere closer than Knoxville, TN could in some way be associated directly or indirectly with one or more of the alleged victims, their families, or any of their associates.

7) At least two local area defense attorneys have publicly asserted negative opinions regarding Williams with no direct knowledge of Williams, his intentions, or his relationships with his lawyers, or otherwise what did or did not actually occur between them.

One such local attorney located in Johnson City, Chris Byrd, stated to local news—among other disparaging comments—in reference to Williams and his relationship with his attorneys: "It might be one out of 100 that you get where somebody is just so bent on this reality they've created for themselves that they keep getting an answer they don't want to hear."

Another local attorney, Charles London, located in Jonesborough, made a similar comment in reference to Williams—among other comments—to local news: "A judge will consider the rights of the defendant and this right to counsel and his right to adequate representation, but judges don't like people to play games with the justice system and abuse those rights and delay the justice that the people and the courts seek to provide," London said.

In another comment, also in reference to Williams, London said, "I'm not surprised at all that anybody in that courtroom probably got a little bit exasperated by hearing an ad nauseum [sic] list of issues, especially when there may not be much substance to those issues."

Similar preconceived notions are likely to be harbored by other lawyers within the immediate area (though they have not voiced these opinions directly to the media) as a result of persistent skewed and negative media coverage and potential relationships with other area attorneys, alleged victims, their families or friends, local government officials, or concerned citizens.

Any such potential views are likely to have a detrimental effect on the attorney-client relationship before any relationship has had a chance to form and as a result any resulting representation.

See:

<https://www.wjhl.com/news/local/sean-williams-case/trial-tuesday-defense-lawyer-on-what-sean-williams-can-expect-representing-self/>

<https://www.wjhl.com/news/local/sean-williams-case/judge-denies-sean-williams-motion-for-new-attorney/>

8) While no attorney should accept appointment as counsel if directly associated with any of the alleged victims or their families (or defendants in any of the three lawsuits mentioned herein), a likely consequence of living in the immediate area does make local attorneys more potentially susceptible to the judgment and views of their own family and friends (which in such a tight-knit area may even overlap with those of the alleged victims), prejudiced colleagues, and concerned citizens.

Though the defense would hope that no attorney would consciously allow this to interfere with their judgment of Williams or the facts of the case and hence effective representation, it is a risk, however small, better eliminated.

Defendant Sean Williams asks the court to appoint counsel from Knoxville or outside the Tri-Cities and the immediate area to ensure defendant's counsel is unaffected by any of the circumstances above and ensure a fair trial for the defendant.

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#### CERTIFICATE

Sent via email from elbow counsel to [grvlclerk@tned.uscourts.gov](mailto:grvlclerk@tned.uscourts.gov) for filling and to [meghan.gomez@usdoj.gov](mailto:meghan.gomez@usdoj.gov) and [emily.swecker@usdoj.gov](mailto:emily.swecker@usdoj.gov) on August 9, 2024.